

U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

April 21, 2021

BY ECF

The Honorable Paul A. Crotty United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

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Accorded to added

Part I hotely

United States v. Ediberto Santana, et al., 20 Cr. 22 (PAC) Re:

Dear Judge Crotty:

In consultation with the parties, the Court has adjourned the next round of status conferences in this case to May and June 2021. Accordingly, the Government respectfully requests that the Court exclude time in the interests of justice under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), from today's date through June 2, 2021—the last of the upcoming status conferences. Such exclusion of time is warranted in light of the logistical difficulties posed by the COVID-19 pandemic, the limited availability of jury trials in this District during the pandemic, and to permit defense counsel additional time to review the voluminous discovery in this case, consider pretrial motions, and discuss with the Government possible resolution of the charges in this case without the need for trial. All defense counsel consent to this request.

Respectfully submitted,

AUDREY STRAUSS United States Attorney

by: Jacqueline Kelly / Celia V. Cohen / Jacob R. Fiddelman / Lindsey Keenan Assistant United States Attorneys (212) 637-2456 / 2466 / 1024 / 1565

Defense counsel (by ECF)

cc: